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September 29, 2022

The Honorable Edgardo Ramos
U.S. District Court for the
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *DarkPulse, Inc. v. FirstFire Global Opportunities Fund, LLC et al.*,
Case No. 1:21-cv-11222-ER

Dear Judge Ramos:

We represent Defendants FirstFire Global Opportunities Fund, LLC and Eli Fireman (“Defendants”) in connection with the above-referenced action. We write to respectfully submit the below supplemental authority regarding Section 29(b), 15 U.S.C. § 78cc(b), for your consideration in connection with Defendants’ Motion to Dismiss the First Amended Complaint (Dkt. Nos. 30–33, 37–38).

- *EMA Financial, LLC v. AppTech Corp.*, 2022 WL 4237144, at *6–7 (S.D.N.Y. Sept. 13, 2022) (“A party cannot enjoy the benefits of a contract and then relieve itself of any obligations under that contract on the sole basis that its counterparty engages in business as a broker-dealer and should have registered with the SEC.”)

KIRKLAND & ELLIS LLP

Hon. Edgardo Ramos
September 29, 2022
Page 2

Respectfully submitted,



Aaron Marks, P.C.

Counsel for Defendants FirstFire Global Opportunities Fund, LLC & Eli Fireman